

EXHIBIT A

CAUSE NO. 2012-CI-18690

JENNIFER RAMIREZ F/K/A
JENNIFER GALINDO,

Plaintiff,

v.

CESAR REYES, JOHNSON &
JOHNSON, AND ETHICON, INC.,

Defendants.

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IN THE DISTRICT COURT

438th JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**NOTICE OF VIDEOTAPED *DE BENE ESSE* DEPOSITION
OF BRUCE ROSENZWEIG, MD**

PLEASE TAKE NOTICE that counsel for Plaintiffs herein will take the videotaped *de bene esse* deposition of Bruce Rosenzweig, MD on Wednesday, March 30, 2016 at 9:00AM at Wexler Wallace, LLP, 55 W Monroe St, #3300, Chicago, IL 60603.

The deposition will be taken before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by stenographic means or court reporter, and the deposition will be recorded by video and audio means. You are invited to attend and cross-examine.

This deposition will be taken pursuant to the Texas Rules of Civil Procedure and will continue from day to day until completed.

Dated: March 1, 2016

Respectfully Submitted,

s/ Tim K. Goss

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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing discovery was served on all counsel of record in accordance with the Texas Rules of Civil Procedure as follows:

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Certified to the 1st of March, 2016 by:

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